

EXHIBIT 2

STATE OF NEW MEXICO
COUNTY OF DOÑA ANA
THIRD JUDICIAL DISTRICT COURT

FILED

2021 MAY -3 PM 2:07

SIXTH JUDICIAL
DOÑA ANA COUNTY, NM

Johnny Burnside, Plaintiff,
(print first, middle and last name)

v. Harbor Freight
Tools (store #236), Defendant.
(print first, middle and last name)

Case No. CV-2021-1016
Judge: James T. Martin

CIVIL COMPLAINT

1. Plaintiff or defendant resides, or may be found in, or the cause of action arose in this county.
2. Plaintiff claims from Defendant the amount of \$ 100,000.00 and also claims interest and court costs.
3. Plaintiff claims from Defendant personal property of the value of \$ _____, which is described as follows:

4. Plaintiff seeks the following additional relief:

5. Plaintiff's claim arises from the following event or transaction:
See Attached Documents

6. Trial by jury IS IS NOT demanded. (If a jury is demanded, an additional cost must be paid upon filing.)

Respectfully submitted,

(SIGN YOUR NAME)

(PRINT YOUR NAME)

(YOUR MAILING ADDRESS)

(CITY/STATE/ZIP)

(YOUR TELEPHONE)

(Email Address)

VERIFICATION

STATE OF NEW MEXICO }
} ss
COUNTY OF DONA ANA }

I, Johnny Burnside, being first duly sworn upon my oath, depose and state that I am the PLAINTIFF in the above-entitled cause. I state that the contents of this COMPLAINT are true and correct, except to the matters stated on information and belief, and those matters I believe to be true.

John Burnside
(SIGN YOUR NAME)
Johnny Burnside
(PRINT YOUR NAME)

SUBSCRIBED AND SWORN to before me on this 3 day of May, 2021, by:

Johnny Levell Burnside, Petitioner.

Liliana Alvarado
Notary public or other officer authorized to administer oaths

Title
Notary

My commission expires: Indefinite Date _____



I have spoken to many of the on-site managers, one in particular I believe his name to be David but the name tag he had said a different name.

I proceeded to do my shopping I took out my phone to look at the online coupons. By the time I got to the end of the aisle their was a hispanic lady I almost ran into her Creeping around the corner she did a double take then turned toward me.

I made a statement under my breath. She yelled out "stop taking pictures of me, stop taking pictures of me I'll call the cops on you." I took a step back and there was a Harbor Freight employee in the aisle, I showed him my phone he turned to the lady and said he's not taking pictures of you.

I'm not sure of his name (David) showed up in the aisle I quickly told him what the situation was. A small crowd of people had assemble in the aisle saying "What did he do to her," being that I was the only African American person in the store.

I felt threatened, discriminated, humiliated and embarrassed. David turned to me and said what do you want me to do about it with a smirk on his face as he turn to walk away.

I said to him if the roles were reversed something would have been done some type of action would have taken place

Whatever you determine
should be the appropriate action
for your employee. But as for
me I am seeking the full
compensation alaud by Federal
and State Law.

For all that I've gone thru
bias and racial discrimination/har-
assment; defamation of character. To
correct the situation that he caused
negligence code of conduct and for
him to acknowledge what his action
had done.

As a person I should be res-
pected and given the opportunity
to shop in these public accommodation
offered to the public without being
profiled

I went online to make a
Complaint with Harbor Freight
regarding prior issue I've been
having. Along with the issue
I'm now dealing with, I have
a e-mail address and a phone
number I don't recall the person
name but he said he would
look into the situation something
about restraining

Jockey
Joe

HARBOR FREIGHT TOOLS

Quality Tools at Ridiculously Low Prices

LAS CRUCES NM #00236
150 W. PICACHO AVE
LAS CRUCES, NM 88005
Telephone: (575) 541-0676

SALE

Customer Name: JOHNNY BURNSIDE
Customer Number: 999039917553

57815 HERCULES 4" BIM HOLE SAW \$18.99

Subtotal \$18.99
Sales Tax 8.312% \$1.58
Total \$20.57

Visa \$20.57

Card No. XXXXXXXXXXXXXXX8578

Expiration Date XX/XX

Auth. No. 014211

VISA DEBIT

Contactless

Signature Verified

Mode: Issuer

AID: A0000000031010

TVR: 000000000

IAD: 06061203A00000

TSI: 0000

ARC: 00

Please Retain For Your Records

Store: 00236 Res: 01 Tran: 741604

Date: 4/27/2021 3:53:17 PM Assoc: XXXXXX

Ticket: 01741604

Item(s) Sold: 1

Item(s) Returned: 0

Rebecca served you today.

Thank you for shopping at

LAS CRUCES NM #00236

Proof of Purchase Required for Returns/
Exchanges Within 90 Days of Purchase.

GET MORE COUPONS

Text TOOLS to 34648

To get coupons and sales alerts via text
message from Harbor Freight! Data rates
may apply. Consent not required for
purchase text STOP to STOP.

LAS CRUCES NM 800236
 150 N. PICOCHO RVE
 LAS CRUCES NM 88006
 Telephone: (575) 541-0876

SALE

Customer Name: JOHNNY BURNSIDE
 Customer Number: 999039917553

56167 0.5 GALLON HAND SPRAYER \$5.49
 If open return by calling 844-416-9141.
 99677 PVC Long Cuff Gloves Blu \$7.99

Subtotal \$13.48
 Sales Tax 8.312% \$1.12
Total \$14.60

Cash \$20.00
 Cash Change \$5.40

Store: 00236 Reg: 01 Tran: 733668
 Date: 4/2/2021 11:17:57 AM Assoc: XXXXX
 Ticket: 01733668.

Item(s) Sold: 2
 Item(s) Returned: 0

Gabriel served you today.
 Thank you for shopping at
 LAS CRUCES NM 800236

Proof of Purchase Required for Returns/
 Exchanges Within 90 Days of Purchase.

GET MORE COUPONS
 Text TOOLS to 34648

To get coupons and sales alerts via text
 message from Harbor Freight! Data rates
 may apply. Consent not required for
 purchase text STOP to STOP.



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